

EXHIBIT A

From: [Jameson Joyce](#)
To: [Julian Frachtman](#); [Law Offices of H Julian Fractman](#)
Cc: [Jennifer Holt](#)
Subject: RE: Al-Sawai discovery follow-up
Date: Tuesday, February 18, 2025 10:03:00 AM

Good morning,

The deposition has begun; the court reporter is in place and ready to proceed. Please indicate if you and your client plan to appear this morning. We will wait until 10:15am.

Regards.

From: Jameson Joyce
Sent: Tuesday, February 18, 2025 8:19 AM
To: Julian Frachtman <hfrachtmanlaw@gmail.com>; Law Offices of H Julian Fractman <info.hjfrachtmanlaw@gmail.com>
Cc: Jennifer Holt <Jennifer.Holt@oag.texas.gov>
Subject: RE: Al-Sawai discovery follow-up

Hello Julian,

Give me a call, thanks.

Jameson

From: Jameson Joyce
Sent: Monday, February 17, 2025 9:41 PM
To: Julian Frachtman <hfrachtmanlaw@gmail.com>; Law Offices of H Julian Fractman <info.hjfrachtmanlaw@gmail.com>
Cc: Jennifer Holt <Jennifer.Holt@oag.texas.gov>
Subject: RE: Al-Sawai discovery follow-up

Julian,

Today is a state holiday and our office is closed. However, given the nature of your email, I called your office twice, to no response. Therefore, I will address your concerns below.

We will proceed with tomorrow's deposition without the audio recordings, which I will hold open. After I review them, if there is anything worthwhile, we will conduct a second deposition, after the February 25 discovery deadline, if necessary. Similarly, 9th hour receipt of audio recordings aside, I've yet to receive any supplement to your client's interrogatory responses. Regardless, per the Court's order compelling discovery, full discovery production was due on Friday.

The link for the deposition is in the attached deposition notice, served on February 5, 2025.

Regarding the deposition, I intend to use documents in the attached ZIP folder.

I will see you tomorrow at 10am.

Regards.

From: Julian Frachtman <hfrachtmanlaw@gmail.com>
Sent: Monday, February 17, 2025 7:20 PM
To: Law Offices of H Julian Fractman <info.hjfrachtmanlaw@gmail.com>
Cc: Jameson Joyce <Jameson.Joyce@oag.texas.gov>
Subject: Re: Al-Sawai discovery follow-up

Jameson,

I've communicated with my client and it is my understanding that her autistic son (whom she home-schools) will be home tomorrow and will likely interrupt the deposition.

On an unrelated note, you never got back to us re audio production. The volume of which is impossible for myself and my paralegal to single handedly carve through in 24 hrs. This was handed to us at the 9th hour by my client.

Lastly, we have not received a zoom link for the deposition.

Based on those 3 factors, I have no other choice but to halt tmrw's deposition and ask you to reschedule.

I am available for conference tomorrow.

Regards,
-hjf

On Mon, Feb 17, 2025, 5:30 PM Law Offices of H Julian Fractman <info.hjfrachtmanlaw@gmail.com> wrote:

Mr. Joyce,
I'm wanting to follow up on Mr. Fractman's email from earlier today as we have not heard back from you.

On Mon, Feb 17, 2025, 11:21 AM Julian Frachtman <hfrachtmanlaw@gmail.com> wrote:

Jameson,

I just wanted to reach out and follow up on things.
I trust the index we provided shows that we did, in fact, produce our documents in an orderly and organized manner...

We did not produce everything on Friday because my client was still compiling things.
She just document dumped us with dozens of audio recordings. Each of which is anywhere between 30 minutes and several hours.

We can get responses to you regarding the **interrogatories** by end of day, today. But producing responsive recordings / production is not possible with the time we have left before the deposition tomorrow.

I leave it up to you if you want to re-schedule the deposition, take it without the audio recordings, or come up with a third solution I have not considered.

I have a massive MSJ hearing today from 2pm until likely 5 or 6pm. (3 parties / 8 motions on deck)

Please include my Office Manager, Ms. Lemon, cc'd above, in your response.

Regards,
-hjf

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H. Julian Frachtman

Attorney & Counselor at Law

Certified Attorney Ad Litem

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tel: 832.499.0611 | fax: 713.651.0819



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Law Offices of H. Julian Frachtman

Qui audet adipiscitur

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